



SHERWIN-WILLIAMS.

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August 16, 2010

Mr. Ray Klimcsak
U.S. Environmental Protection Agency – Region 2
290 Broadway 19th Floor
New York, New York 10007-1866

RE: Response to Comments
United States Environmental Protection Agency June 17, 2010 Letter
Addendum to the May 2009 Supplemental RI Work Plan
Sherwin-Williams/Hilliard's Creek Site – Former Manufacturing Plant,
Gibbsboro, New Jersey
Administrative Order Index No. II CERCLA-02-99-2035
Incorporation of West Clementon Road Residential Properties, dated April
29, 2010

Dear Mr. Klimcsak:

Attached is a revised "Addendum to the May 2009 Supplemental RI Work Plan, Sherwin-Williams/Hilliard's Creek Site – Former Manufacturing Plant, Gibbsboro, New Jersey", that incorporates sampling at eight residential properties along West Clementon Road in Gibbsboro, New Jersey. As discussed below, Sherwin-Williams has incorporated all of the comments provided by the United States Environmental Protection Agency (EPA) into the revised addendum.

This letter provides specific responses to the EPA comments. The EPA comments are provided in italics, and Sherwin-Williams' responses follow.

General Comment

EPA and NJDEP maintain the utilization of a uniform 20' x 20' grid sample spacing per property across all residential properties, however, as will be presented later there will be instances when samples can be eliminated (rationale is provided later, on a property-by-property basis). EPA recognizes that both EPA data and data collected by the Sherwin-Williams Company will be used for future considerations. EPA is also recommending that an updated residential access form be sent which explains that additional sampling may be necessary and that the access form may cover any (future) event(s).

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Response

A baseline 20' x 20' grid has been used at each of the West Clementon Road properties. At the direction of the EPA, sample locations have been adjusted or removed from the 20' x 20' grid at some of the properties, as specified in the *Specific Comments* provided.

Specific Comments

1. Discussion (The size of the sampling grid), page 3

- *EPA approves the sampling grid presented in Figure 1 (20 x 20) and will use this figure as the basis of specific comments/exceptions. EPA and NJDEP agree with the 20 x 20 foot grid as proposed for 23A, 23B and 25 W. Clementon Road.*
- *Use a 20 x 20 ft. grid for 29 W. Clementon Road. Remove samples: 29-SB13 and SB-14B, however, place a sample approximately 10 ft. diagonally off the southwest corner of the house (approximately in the middle between fence and sidewalk); remove sample 29-SB18 and shift 29-SB17 to the approximate middle of flower bed, and include a sample 20 ft. immediately west of EPA sample "29-ss-10".*
- *Utilize a 20 x 20 ft grid at 31 West Clementon Road, but do not collect samples: 31-SB7 (because have clean EPA sample – 31-ss-6) and 31-SB10 (because have a clean EPA sample 31-ss-5).*
- *Utilize a 20 x 20 foot grid, but rather than collecting sample 33-SB3 at proposed location (because of the fact that there is a "clean" EPA sample 33-ss-9), relocate the sample to the front of the house and situate it 10 ft. off fence-line and the approximate middle between house and fence), additionally, can eliminate sample 33-SB14, because it appears to be much closer than 20 ft. from sample 33-SB13.*
- *Utilize a 20 x 20 ft. grid for 35 West Clementon Road for samples 35-SB1 – 35-SB23; however, please eliminate sample 35-SB17 (because have clean EPA sample at 35-ss-3. In addition, remove samples 35-SB20 – 35-SB22; finally shift samples 35-SB24 and 35-SB25 10 ft. off fence-line. Samples SB-26 and SB-27 are appropriate as proposed.*
- *Utilize a 20 x 20 ft. grid for 43 West Clementon Road; however, the following samples from the proposed spacing should be retained: SB1, SB3 – SB6, SB-8, SB 10, SB-12, SB-13, SB-15, SB-17, SB-19 – SB22, SB-24, SB-25, SB-27, SB-29, SB-32, SB-34, SB-36, SB-38, SB-40, SB-42, SB-43, SB-46, SB-47, SB-49, and SB-51.*

Response

The EPA comments have been incorporated into the sampling plan for the West Clementon Road properties. The proposed sampling locations, which incorporate the EPA comments, are shown on Figure 1 of the revised addendum.

2. Discussion (Re-sampling of previous locations at which EPA found arsenic and/or lead at a concentration greater than the RDCSRS), page 3 – EPA concurs with

Sherwin-Williams' proposal to return to the EPA sample locations where one or more constituents were found at a level greater than the RDCSRS, but when the grid boring location and the former EPA location are in close proximity to each other (within 5 feet), it is proposed that the EPA boring location be used in place of the grid location.

Response

The comment has been incorporated into sampling locations shown on Figure 1 of the revised addendum.

3. *Discussion (Horizontal Delineation), page 4 – Additional Step-Out Borings for Horizontal Delineation, Page 7 - Horizontal Delineation, page 7 SW proposes off-property sampling to the north of 23A and South of 43 and east of all properties if necessary. However, EPA requests that at 29 West Clementon Road two samples be placed 10 ft. from the back of the fence parallel to samples 29-SB1 and 29-SB2. At 31 West Clementon Road, the area in back of the resident's fence be sampled now, based on the resident's statement that he moved dirt to the other side of the fence during landscaping activities on his property. Finally, EPA is also requesting that two samples be placed at 35 West Clementon Road (based on EPA data), and that two samples be collected 10 ft. from samples 35-SB3 and 35-SB4.*

Response

The requested sample locations have been included, as shown on Figure 1 of the revised addendum.

4. *Discussion (Additional Step-Out Boring for Horizontal Delineation), page 7 – The first sentence of the last paragraph cites that a "removal action" may be designed; please revise this sentence to the language which is used on Page 9, that cites "...recommendations for further investigation or remedial action, ..".*

Response

The revised addendum has been modified to state that, "The results of this investigation will be used to develop recommendations for further investigation and/or remedial action."

5. *Scope of Work (Bullet 1), page 9 – EPA concurs with approach.*

Response

Comment noted.

6. *Scope of Work (Bullet 2), page 9 – EPA is requesting that any step-out past a residential property line not be 15 ft., but 10 ft.*

Response

The revised addendum has been changed to state that horizontal step-out borings, if required, will be installed at a distance of ten feet from the applicable residential

property line or the off-property borings that are to be installed at 29 W. Clementon Road.

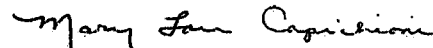
7. *Scope of Work (Bullet 3), page 9 - SW is proposing the use of a PID to screen soils and has set a "limit" reading of 100 ppm as an action level. Previously when EPA had requested the use of an "action limit" for the PID, the response was that it should be left to the judgment of the field technician. Should keep it consistent, not sure why an arbitrary number was selected.*

Response

The revised addendum has been modified to state, "If, based on PID readings and field observations (odor, evidence of staining), the field team concludes there is a potential for volatile organic compounds to be present, the sample will also be analyzed for Target Compound List (TCL) VOCs."

Should you have any other recommendations or if you have any questions or comments, please do not hesitate to contact me at (216) 566-1794 or via e-mail at mlcapichioni@sherwin.com.

Sincerely,



Mary Lou Capichioni
Director Remediation Services

Attachment

cc: J. Josephson, EPA (New York)
W. Sy, EPA (Edison)
L. Vogel, NJDEP (4 copies)
P. Parvis, HDR
J. Gerulis, Sherwin-Williams (w/o enclosures)
A. Danzig, Sherwin-Williams (w/o enclosures)
S. Peticolas, Gibbons, Del Deo, Dolan, Griffinger, & Vecchione (w/o enclosures)
H. Martin, ELM
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